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18 MARY JEAN HONG

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 MARY JEAN HONG,

23 Plaintiff,

24 v.

25 RIGHT MANAGEMENT
26 CONSULTANTS, INC., DOES 1 through
27 100, inclusive,

28 Defendants.

Case No. C04 4011 PJH (EDL)

DISCOVERY MATTER

**STIPULATION AND ~~PROPOSED~~
ORDER RE DISCOVERY MOTION
DEADLINE WITH REGARD TO
PLAINTIFF'S DEPOSITION OF JAMES
GREENWAY**

1 **WHEREAS** the parties have reached agreement on their dispute concerning certain
 2 lines of inquiry about which James Greenway had been instructed not to answer at his December 7,
 3 2005 deposition.

4 **IT IS HEREBY STIPULATED AND AGREED** by and between the Parties hereto
 5 through their undersigned counsel, that Defendant agrees to produce James Greenway for further
 6 deposition via telephone on January 2, 2006, concerning the lines of inquiry agreed to by the parties,
 7 and for reasonable follow-up questions thereon. Defendant makes this stipulation without waiving
 8 any of its objections to the lines of questioning agreed to by the parties, and without prejudice to any
 9 other rights and remedies it has with regard to the proposed line of questioning. The Parties further
 10 agree and that Plaintiff's deadline for moving to compel any questions asked in that deposition shall
 11 be extended to January 11, 2005, and that Plaintiff may bring any such motion on an expedited basis,
 12 in accordance with Civil L.R. 37-1(b).

13 **IT IS SO STIPULATED.**

14
 15 DATED: December 16, 2005

By: _____/s/
 PAUL D. HERBERT
 THE LOUDERBACK LAW FIRM
 Attorneys for Plaintiff
 MARY JEAN HONG

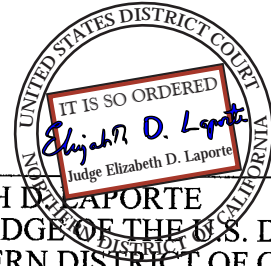
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 17
 18
 19 DATED: December 15, 2005

By: _____/s/
 RONALD D. ARENA
 LITTLER MENDELSON, P.C.
 A Professional Corporation
 Attorneys for Defendant
 RIGHT MANAGEMENT
 CONSULTANTS, INC.

20
 21
 22
 23 **SO ORDERED.**

24 DATED: December 16, 2005

25
 26 HON. ELIZABETH D. LAPORTE
 MAGISTRATE JUDGE OF THE U.S. DISTRICT
 COURT, NORTHERN DISTRICT OF CALIFORNIA



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